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8 *NETFLIX, INC.*

9  
10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 OAKLAND DIVISION  
13

14 LAURI VALJAKKA,  
15 Plaintiff,  
16 v.  
17 NETFLIX, INC.,  
18 Defendant.

Case No. 4:22-cv-01490-JST  
**DEFENDANT NETFLIX, INC.'S  
OPPOSITION TO RAMEY LLP AND  
WILLIAM P. RAMEY, III'S AMENDED  
RESPONSE TO SUPPLEMENTAL BRIEF  
REGARDING EXPENSES AND FEES  
PURSUANT TO ECF NO. 324**

1 Netflix opposes Mr. Ramey's request to limit any fee judgment to Ramey LLP alone. The  
2 Court's Order (ECF No. 324) expressly addressed whether "Ramey and Ramey LLP" are liable for  
3 fees and found that Mr. Ramey personally violated the Protective Order, awarding compensatory  
4 sanctions under Rule 37(b). Rule 37(b)(2)(C) authorizes the Court to order "the disobedient party,  
5 the attorney advising that party, or both" to pay the reasonable expenses caused by the violation.  
6 Nothing in ECF No. 324 limits liability to the firm or suggests Mr. Ramey should be exempted  
7 personally; to the contrary, the Order repeatedly identifies his personal conduct as the basis for  
8 sanctions. Because the fees were "directly caused" by Mr. Ramey's violation and the Court already  
9 framed liability as to "Ramey and Ramey LLP," his request for a clarification limiting judgment to  
10 the firm should be denied. The fee award should run against Mr. Ramey and Ramey LLP, jointly  
11 and severally.

1 Dated: September 25, 2025

Respectfully submitted,

2 /s/ Elise Edlin

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